

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

BARRETT GREGOIRE, PLAINTIFFS

LINDA GREGOIRE ,

P.O. BOX 26,

GRANITEVILLE, VT. 05654

v.

CITIZENS BANK N/A, DEFENDANTS

RBS CITIZENS BANK

1 CITIZENS DRIVE,

PROVIDENCE , RI. 02915

JOESEPH CARELLI

900 ELM STREET,

MANCHESTER, NH 03101

CASE NO. 5:19-cv-64

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED
2019 APR 25 PM 4:57
CLERK
BY WV
DEPUTY CLERK

COMPLAINT

DECLATORY JUDGEMENT, DEFENDANT HAS REFUSED TO GIVE PLAINTIFFS THEIR BANK RECORDS IN TOTALITY AND TRANSPARENTLY TO COMPLETE FEDERAL INCOME TAX SINCE 2012. PLAINTIFFS NEED TO COMPLETE BUILDING SALES AND HAVE TRUTHFUL ACCURATE DEPRECIATION SCHEDULES AND INCOME AND EXPENSES. IN ADDITION DEFENDANT IS REFUSING TO PROVIDE REQUIRED REPORTING STATEMENTS FOR 1098 INTEREST, 1099, AND STATEMENT OF EXPENDITURES FOR CAPITAL IMPROVEMENTS. PLAINTIFF REQUESTS COURT FORCE THE DEFENDANT TO PROVIDE THE RECORDS AND PROVIDE PLAINTIFF TREBLE DAMAGES IN THE LEGAL EXPENSES AND LOSS WAGES FOR THE INFRACTIONS. IN THE EVENT DEFENDANT DESTROYED THE RECORDS DESPITE BEING PUT ON CONTINUAL NOTICE OF THE NEED FOR THEM THE COURT NEEDS TO ASSESS SEVERE APPLICABLE DAMAGES.

DECLATORY JUDGEMENT THE DEFENDANT HIRED AN EMPLOYEE ILLEGALLY VIOLATING FDIC SECTION 19 CODE, THE PLAINTIFF REQUESTS THE COURT IMMEDIATELY NULL AND VOID ANY AND ALL AGREEMENTS SIGNED BY THE ILLEGAL FELON BANK VICE PRESIDENT VEDANTA DUMAS GRIFFITH A/K/A, AURA SPRIESTERBACH FOR THE PLAINTIFF AND ALL BANK CUSTOMERS DURING HER EMPLOYMENT. A FELON WITHOUT WRITTEN FDIC APPROVAL CANNOT CONDUCT OR BE INVOLVED IN ANY CONDUCT IN A BANK. CITIZENS BANK WAS IN VIOLATION OF THE FDIC HIRING SCREENING PROCESS AND HAS FAILED TO NOTIFY ANY CUSTOMERS OF THE 2016 OCC OUSTER OF THE BANKER BY 1829 REMOVAL SECTION US 12. ALL BANKING SHE PARTICIPATED IN WAS ILLEGAL AND VOID. THESE ACTIONS AND THE BANK COVERUP TOLL FOR YEARS. PLAINTIFF REQUESTS THE COURT ORDER CITIZENS BANK N/A TO NOTIFY ALL CLIENTS OF THE BANK INVOLVED ILLEGALLY WITH THE FELON BANKER OF THIS FEDERAL VIOLATION.

JURISDICTION

MULTIPLE STATES DEALING WITH THE PLAINTIFF IN NEW HAMPSHIRE , MASSACHUSETTS AND RHODE ISLAND. THE LAWS VIOLATED ARE FEDERAL IN NATURE IRS REPORTING AND FDIC.

CLAIMS

1) DECLATORY JUDGEMENT CITIZENS BANK AND JOSEPH CARELLI HAVE REFUSED TO COMPLY WITH FEDERAL IRS REPORTING IRC 6041, 1099, 1098, LAWS. PLAINTIFF HAS REQUESTED RECORDS SINCE 2012 AND SPENT CONSIDERABLE LEGAL FEES AND TIME TRYING TO OBTAIN. IN ADDITION CARRYOVER LOSSES WILL BE TAKEN FROM THE PLAINTIFF DUE TO THE YEARS OF DELAYS,SEE ATTACHED SMALL PORTION OF THE EFFORTS EXHIBIT 1. CITIZENS BANK MUST PROVIDE IMMEDIATELY IN TOTALITY AND SWEAR TO THE ACCURACY OF THE RECORDS.

2) DECLATORY JUDGEMENT CITIZENS BANK AND JOSEPH CARELLI FAILED TO SCREEN AND ILLEGALLY HIRED A IDENTITY THEFT FELON VEDANTA DUMAS GRIFFITH A/K/A AURA SPRIESTERBACH AS A WORKOUT OFFICER VICE PRESIDENT , WITH FALSE PRETENSE CHARGES, FAKE COLLEGE DEGREES, BAD CREDIT, MULTIPLE BANKRUPTICES AND PATTERN OF SCAMMING PROPERTY OWNERS. IN 2016 THE US GOVERNMENT THROUGH OCC CHARGED HER WITH 1829 REMOVAL. CITIZENS BANK AND JOSEPH CARELLI HAVE REPEATEDLY DENIED AND FAILED TO DISCLOSE THE ILLEGAL BANK ACTIONS. A FELON CANNOT WORK IN A BANK, SIGN ANY AGREEMENTS OR BE INVOLVED IN ANY CONDUCT. SEE EXHIBIT 2.

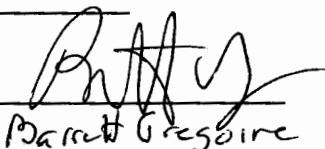
RELIEF

THE COURT MUST FORCE THE DEFENDANT TO PROVIDE THE PLAINTIFFS RECORDS IN TOTALITY AND TRANSPARENTLY AND SWEAR TO THE ACCURACY. IF THEY CLAIM DESTRUCTION A SEVERE PENALTY FOR EACH CHECK, DEPOSIT TICKET, IRS FORMS ETC SHOULD BE ASSESSED AND MONETARY TREBLE DAMAGES TO THE PLAINTIFF FOR ALL LEGAL FEES INCURRED, LOSS WAGES TRYING TO ACQUIRE THE RECORDS. THE PLAINTIFF ALSO REQUESTS THE COURT VOID ANY AND ALL BANK AGREEMENTS SIGNED BY VEDANTA DUMAS GRIFFITH OR ANY AGREEMENTS SHE HAD INVOLVEMENT WITH. IN ADDITION EACH AND EVERY BANK CUSTOMER MUST BE NOTIFIED BY THE BANK OF THIS INFRACTION AND PROOF PROVIDED TO THE COURT. THE PLAINTIFF ASKS THE COURT FOR TREBLE DAMAGES FOR THE LOSSES INCURRED DEALING WITH THE FELON BANKER AND SUBSEQUENT AGENTS AND ASSIGNEES RELATED TO THE FELONS ACTIONS.

4/18/2019

DATE 4-18-2019

SIGNATURE


Linda Gregoire

ADDRESS

PO Box 26 Granville VT 05654

SIGNATURE

NAME


Linda Gregoire